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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DONALD LEO MELLEIN,

Plaintiff,

v.

**UNITED STATES OF AMERICA;
Federal Bureau of Investigation
Special Agent LYNNE ZELLHART,
in her individual capacity; and DOES
1 through 5, Federal Bureau of
Investigation agents in their
individual capacities,**

Defendants.

Case No. 2:23-cv-07970

**PLAINTIFF'S NOTICE OF
RELATED CASES**

Plaintiff Don Mellein hereby provides notice of related cases pursuant to Local Rule 83-1.3.1. This case is related to the following cases that have been filed in this Court (which are also noted on the civil cover sheet):

Case Title	Case No.	Date Filed
<i>Jeni Pearsons, et al. v. U.S., et al.</i>	No. 23-cv-7952	9/22/2023
<i>U.S. v. U.S. Private Vaults</i>	No. 21-cr-106	3/9/2021
<i>John Doe v. U.S., et al.</i>	No. 21-cv-2803	3/31/2021
<i>James Poe v. U.S., et al.</i>	No. 21-cv-2900	4/3/2021
<i>Richard Roe v. U.S., et al.</i>	No. 21-cv-2919	4/5/2021
<i>Michael Moe v. U.S., et al.</i>	No. 21-cv-2990	4/6/2021
<i>Charles Coe v. U.S., et al.</i>	No. 21-cv-3019	4/7/2021
<i>Does 1-6 v. U.S., et al.</i>	No. 21-cv-3254	4/15/2021
<i>Michael Magee v. U.S., et al.</i>	No. 21-cv-3294	4/16/2021
<i>Mitchell Magee v. U.S., et al.</i>	No. 21-cv-3298	4/16/2021
<i>Louis Loe v. U.S., et al.</i>	No. 21-cv-3348	4/19/2021
<i>Dr. Linda R., et al. v. U.S.</i>	No. 21-cv-3554	4/26/2021
<i>John Joe v. U.S., et al.</i>	No. 21-cv-4366	5/25/2021
<i>Paul Snitko, et al. v. U.S.</i>	No. 21-cv-4405	5/27/2021
<i>Peter Gallagher v. U.S.</i>	No. 21-cv-5073	6/22/2021
<i>Jack Doe, et al. v. U.S., et al.</i>	No. 21-cv-5695	7/14/2021
<i>Donald Leo Mellein, et al. v. U.S., et al.</i> ¹	No. 21-cv-6588	8/13/2021

¹ Plaintiff here was also a plaintiff in case no. 21-cv-6588, which was dismissed without prejudice.

Case Title	Case No.	Date Filed
<i>United States v. \$305,000</i>	No. 21-cv-6968	8/30/2021
<i>United States v. \$341,500.00</i>	No. 21-cv-6967	8/30/2021
<i>United States v. \$399,000.00</i>	No. 21-cv-6966	8/30/2021
<i>United States v. \$600,980.00</i>	No. 21-cv-6965	8/30/2021
<i>United States v. \$599,870.00 Plus Coins, et al.</i>	No. 21-cv-7078	9/2/2021
<i>United States v. \$462,880.00 Plus Jewelry</i>	No. 21-cv-7077	9/2/2021
<i>United States v. \$400,000.00</i>	No. 21-cv-7153	9/7/2021
<i>United States v. \$240,000.00 and Misc. Precious Items</i>	No. 21-cv-7155	9/7/2021
<i>United States v. \$1,500,090.00</i>	No. 21-cv-7192	9/8/2021
<i>United States v. \$709,900.00</i>	No. 21-cv-7191	9/8/2021
<i>United States v. \$250,000.00</i>	No. 21-cv-7188	9/8/2021
<i>United States v. \$914,700.00</i>	No. 21-cv-7242	9/9/2021
<i>United States v. \$150,900.00</i>	No. 21-cv-7231	9/9/2021
<i>United States v. \$1,083,740.00</i>	No. 21-cv-7279	9/10/2021
<i>United States v. \$1,182,500.00</i>	No. 21-cv-7286	9/10/2021
<i>United States v. \$1,207,685.00</i>	No. 21-cv-7276	9/10/2021
<i>United States v. \$443,000.00</i>	No. 21-cv-7315	9/13/2021
<i>United States v. \$1,479,100.00</i>	No. 21-cv-7311	9/13/2021
<i>United States v. \$256,276.00, et al.</i>	No. 21-cv-7310	9/13/2021
<i>United States v. \$325,680.00</i>	No. 21-cv-7331	9/14/2021
<i>United States v. \$274,030.00</i>	No. 21-cv-7481	9/17/2021

Case Title	Case No.	Date Filed
<i>United States v. \$330,020</i>	No. 21-cv-7472	9/17/2021
<i>United States v. \$199,950.00</i>	No. 21-cv-7487	9/17/2021
<i>United States v. \$154,600.00</i>	No. 21-cv-7484	9/17/2021
<i>United States v. \$1,194,750.00</i>	No. 21-cv-7477	9/17/2021
<i>United States v. \$570,000.00</i>	No. 21-cv-7463	9/17/2021
<i>United States v. \$340,000.00, et al.</i>	No. 21-cv-7505	9/20/2021
<i>United States v. \$200,000.00</i>	No. 21-cv-7566	9/22/2021
<i>United States v. \$217,285.00 and Two Rolex Watches, et al.</i>	No. 22-cv-0015	1/3/2022
<i>United States v. Cryptocurrency</i>	No. 22-cv-0556	1/26/2022
<i>Doe I, et al. v. United States, et al.</i>	No. 22-cv-1722	3/15/2022
<i>United States v. \$726,300.00, and 196 Misc. Collectible Coins</i>	No. 22-cv-5908	8/19/2022

Both this lawsuit and the above lawsuits originated with the government's March 22, 2021, raid of U.S. Private Vaults (USPV), a private safe-deposit box company that operated in Beverly Hills, California. The above lawsuits include the criminal proceeding against USPV (which included motions for the return of property filed by non-parties), separate lawsuits by boxholders challenging the seizure of their property and seeking its return, a class action (*Snitko*) challenging whether the Fourth Amendment permitted the government to open and search the safe-deposit boxes, and civil forfeiture actions brought by the government against property it seized from some of the safe-deposit boxes. This case centers on obtaining a remedy for an individual Plaintiff, who stored personal property in his safe-deposit box at USPV that was lost after the government took custody of it

1 during the raid. Except for *Pearsons v. United States* (also filed today), this lawsuit
 2 therefore involves different legal theories and different forms of relief, and
 3 generally challenges different aspects of the government's USPV raid, than the
 4 cases identified above. This case and the cases identified above will nevertheless
 5 involve some factual overlap regarding the execution of the raid and the conduct of
 6 ensuing searches.

7 Additionally, both this case and *Pearsons v. United States* seek damages
 8 resulting from the government's loss of property that was stored in the USPV
 9 boxes. They therefore raise similar factual questions about the government's
 10 promises to safeguard the property and its failure to do so. They also raise similar
 11 legal questions about the plaintiffs' right to damages resulting from the government
 12 losing their property.

13 Dated: September 22, 2023

Respectfully Submitted,

14
15 /s/ Lou Egerton-Wiley

16 **INSTITUTE FOR JUSTICE**

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